

UNITED STATES FEDERAL COMMUNICATIONS COMMISSION

In Re Applications of:) EB DOCKET No.: 01-39
FAMILY BROADCASTING, INC.)
Order to Show Cause Why)
the Licenses for Stations)
WSTX (AM) and WSTX-FM,)
Christiansted, U.S. Virgin)
Islands, Should Not Be)
Revoked)

WITNESS: BARBARA JAMES PETERSEN

Volume: 1
Pages: 1 through 95
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Date: May 10, 2001

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ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Revoked)	

Room 8-C858
FCC Headquarters
445 12th Street, S.W.
Washington, D.C. 20554

Thursday,
May 10, 2001

The parties met, pursuant to the notice of the
Judge at 10:02 a.m.

BEFORE: HONORABLE RICHARD L. SIPPEL
Administrative Law Judge

APPEARANCES:

On behalf of Family Broadcasting, Inc.:

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I N D E X

VOIR

<u>WITNESSES:</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>	<u>DIRE</u>
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BARBARA JAMES-PETERSEN	5	91	95		
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Examination by FCC:

Hearing Began:	10:02 a.m.	Hearing Ended:	2:09 p.m.
Recess Began:	11:09 a.m.	Recess Ended:	11:26 a.m.
Recess Began	12:42 p.m.	Recess Ended	1:48 p.m.

E X H I B I T SIDENTIFIEDRECEIVEDREJECTEDFamily Broadcasting:

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P R O C E E D I N G S

(10:02 a.m.)

Whereupon,

BARBARA JAMES-PETERSEN

having been duly sworn, was called as a witness
and was examined and testified as follows:

DIRECT EXAMINATION

Q Could you state your full name for the record,
please?

A My name is Barbara James-Petersen,
P-e-t-e-r-s-e-n.

Q Are you feeling well today?

A As well as could be expected, thank you.

Q Is there anything we should know about that might
affect your testimony today?

A No. Nothing that I can think of.

Q Well, before we continue, I just want to lay out
some ground rules. If you wish to take a break, please so
indicate, and we will take one. If you don't understand a
question that I have asked, I'll repeat it, or if necessary
rephrase it. The questions are for you to answer, not your
counsel. Please answer the question asked. If you feel the
need to change an answer you have already given, please let
me know that is what you wish to do, and we'll make sure
your corrected answer is noted.

1 When I finish, your counsel will have a chance to
2 ask you questions. Are we ready?

3 A Yes.

4 Q What position, if any, do you currently have with
5 Family Broadcasting, Inc.?

6 A I am currently the general manager of radio
7 stations WSTX, and I am currently the president of Family
8 Broadcasting.

9 Q When you say radio stations WSTX, you are
10 referring to WSTX AM and WSTX FM, correct?

11 A Yes, I am.

12 Q What is your business address?

13 A Post Office Box -- mailing address, Post Office
14 Box 3279, Christiansted, St. Croix, U.S. Virgin Islands
15 00822. Physical address, No. 140 Augusta, Christiansted,
16 St. Croix, U.S. Virgin Islands.

17 Q Now could you please list all of your prior
18 residences, back to September of 1990?

19 A Prior to September 1990?

20 Q No. From September -- I may have misstated that.
21 From September 1990 forward.

22 A From September 1990 to the current time, physical
23 address No. 83, Christiansted, St. Croix, U.S. Virgin
24 Islands.

25 Q Could you please describe your educational

1 background, beginning with college?

2 A Okay. I have a bachelor of science degree from
3 Marygrove College, Detroit, Michigan, major in biology,
4 minor in chemistry; and I hold a juris doctorate degree from
5 Howard University School of Law , 1979.

6 Q Are you currently a member of any bar?

7 A No, I'm not.

8 Q Have you ever been a member of any bar?

9 A No, I have not.

10 Q Could you please describe your work background
11 since law school?

12 A Since law school, I have done legal research. I
13 have worked as chief of staff in the Virgin Islands
14 legislature on a senator's office. I have worked as general
15 manager of the radio station.

16 Q Could you give us some dates that correspond with
17 that?

18 A Okay. Since graduating -- well, from 1990, since
19 returning home, I worked as general manager of the radio
20 station until the end of 1992. And from 1993 to 1996, I
21 worked -- not in 1996, 1997. I worked as first legal
22 researcher at the legislature and then chief of staff in a
23 senator's office. And then from 1998, July 1, 1998, to the
24 current time, I have been a general manager. But in between
25 there, I was just a housewife. I have a son who is sick,

1 so --

2 Q I didn't catch that.

3 A I have a son who is sick, so I have been taking
4 care of him.

5 Q Sick, as in ill in some way?

6 A Yes, mm-hmm.

7 Q And what is the --

8 A He is severely asthmatic, and I usually have to
9 travel back and forth with him to Children's Hospital, or he
10 is usually in the hospital at home. He just came out of the
11 hospital two weeks ago.

12 Q I'm sorry to hear that. When you said Children's
13 Hospital, did you mean Children's Hospital here in the
14 District of Columbia?

15 A Yes.

16 Q And within the past -- since July 1, 1998, when
17 you resumed your role as general manager of the radio
18 stations, how many times and for what periods have you had
19 to come to Washington, D.C., with your son?

20 A In 1999, six weeks, and -- 1999, six weeks. In
21 2001, I was here with him for about two weeks. And then I
22 was here earlier this year because my husband suffered a
23 heart attack. So I was here from March 1st. And then while
24 I was here with my son and my husband with the heart attack,
25 my children were here with me, but went back home. Then my

1 son ended up in the hospital, so I left and had to go back
2 home.

3 Q And what time frame is this?

4 A That is between March 1st and April 10th.

5 Q So from March 1st to April 10th, this year 2001?

6 A Yes.

7 Q You were in Washington, D.C.?

8 A Yes, I was.

9 Q Now during those periods, when you have been in
10 Washington, D.C., from July 1, 1998, forward, who if anyone
11 serves as the station's general manager in your absence?

12 A Well, in my absence, if anything is needed, they
13 refer to my father. However, I have two employees at the
14 radio station who serve -- one serves as the station
15 manager/news director. His name is Alvin G. Southwell. And
16 I have Al Clark, who serves as program director and also
17 production manager. So they are the ones who carry on in my
18 absence.

19 Q And that has been the case from July 1, 1998,
20 forward?

21 A Yes, unless something really drastic is needed,
22 and then they will contact my parents. But as far as the
23 daily operation of the station, they are the ones who will
24 oversee it in my absence.

25 MR. SHOOK: I'd like to have marked for

1 identification as Deposition Exhibit 1 the document that I
2 have here. It's 17 pages total. I can distribute copies
3 when you're finished here so everybody can see what I am
4 going to be talking about.

5 (The document referred to was
6 marked for identification as
7 Deposition Exhibit No. 1)

8 MR. SHOOK: If you would, please, just take a
9 brief look through this so you know what it is we're talking
10 about. Then I'll ask some questions about it.

11 MR. COLBY: Did you receive the amendment we
12 filed?

13 MR. SHOOK: I believe the amendment was part of
14 what you have. I just added it on, so there is eight pages
15 of the original submission and then the eight pages of the
16 amendment plus a final page, which reflects that it was
17 electronically filed successfully, the amendment, that is.

18 Now, first of all, are you familiar with this
19 document?

20 THE WITNESS: Yes, I am.

21 BY MR. SHOOK:

22 Q Could you briefly tell us what it is?

23 A Okay. This is a document that I requested of
24 counsel to have completed so that the transfer -- the
25 control of Family Broadcasting can be transferred from my

1 father to me and my brothers.

2 Q Now could you briefly describe what your role was
3 in preparing this application?

4 A Well, I provided the information that I had access
5 to, which my information was limited since my father was the
6 one who handled everything from the beginning, as far as FCC
7 documents were concerned. But whatever information I was
8 familiar with was what I provided to counsel to complete.

9 Q Did you review the application before it was
10 submitted to the FCC?

11 A Yes, I did.

12 Q Was the application complete at that point?

13 A Yes. There was one amendment that was made a
14 correction, and that was done and it was completed.

15 Q So in other words, other than the amendment, all
16 of the information that was contained in the original
17 submission you have reviewed prior to its submission to us.

18 A Yes.

19 Q Now I want to direct your attention to Section 2,
20 question 4, which appears on page 2 of Deposition Exhibit 1.
21 And the particular information that I'm looking at is that
22 which notes the percentage of votes that both your father
23 and your mother have listed here. Do you see what I'm
24 talking about, where it says the percentage of votes for
25 Gerard Luz A. James is 51, and the percentage of votes for

1 Asta K. James is 42?

2 A Yes.

3 Q Now what role, if any, did you have in putting
4 down those percentages, the 51 and the 42?

5 A Okay. These are the original percentages that had
6 been used initially.

7 Q When you say used initially, you are referring to
8 when family acquired the licenses back in 1990?

9 A Yes, to the best of my knowledge.

10 Q Did you have some documents to look at in order to
11 derive those numbers?

12 A I think we had an old copy of -- it may have been
13 an ownership report that had been filed. I have no idea
14 what year, but that had been filed long before this.

15 Q Now did you speak with your father about whether
16 the percentage of votes that he held as of March 2001 was 51
17 percent?

18 A Yes. He did indicate that.

19 Q He did? And you spoke with your mother to confirm
20 that her percentage of votes in March of 2001 was 42?

21 A Yes.

22 Q Now other than the ownership report to which you
23 referred, was there any other documentation that you looked
24 at in order to verify that the percentage of votes for your
25 father and mother were 51 and 42 respectively?

1 A No, I have no other documents.

2 Q I want to direct your attention to Section 4,
3 question 5, and that appears on page 4, down at the bottom.
4 And the question -- questions, I should say, since there are
5 two of them here. A, "The written agreements and the
6 licensee/permittee's public inspection file and submitted to
7 the Commission embody the complete and final agreement to
8 transfer control of the stations specified in Section 3,
9 question 2"; and B, "These agreements comply fully with the
10 Commission's rules and policies. And it appears that the
11 yes answer is marked to that question?

12 A Yes.

13 Q And then there appears to be a reference to an
14 Exhibit 13. If you go to page 7, you will see a reference
15 to Exhibit 13 down at the bottom. Do you see that?

16 A Yes.

17 Q And it says, "Description Agreements." And then
18 it says, "See Exhibit 6." So we go to Exhibit 6, which is
19 also on page 7. And if I understand the agreements referred
20 to, this is stating that your father and your mother
21 proposed to gift their stock to you and your brothers?

22 A Yes.

23 Q Is that the transaction that we're talking about
24 here?

25 A Yes, it is.

1 Q The agreement, if you will? Now has your mother
2 agreed to transfer her shares of stock to you and your
3 brothers?

4 A Yes, she has.

5 Q Does she state that anywhere? Is there a writing
6 that evidences that?

7 A No. It was verbal.

8 Q A verbal promise from your mother?

9 A Mm-hmm.

10 Q Made to you and your brothers?

11 A Yes.

12 Q Did she make this promise in your presence?

13 A Yes, she did.

14 Q So she spoke to you, I am going to give you my
15 stock?

16 A Yes.

17 Q And when she did that, she was speaking to you,
18 but she was including your brothers, or were your brothers
19 present? If you could, please give me some idea of how this
20 worked?

21 A Well, she spoke to me, and she told me that she
22 was going to turn everything over to us, along with what my
23 father was doing.

24 MR. SHOOK: I'd like to have our next document
25 marked.

1 (The document referred to was
2 marked for identification as
3 Deposition Exhibit No. 2)

4 MR. SHOOK: Just so you know, there are a number
5 of blank pages that are getting thrown into this.

6 MR. COLBY: We have extra copies with us anyway.

7 MR. SHOOK: You do? Okay. Now what has been
8 marked as Deposition Exhibit 2, have you seen this document
9 before?

10 THE WITNESS: Yes, I have.

11 BY MR. SHOOK:

12 Q And did you read through it in its entirety?

13 A Yes, I have.

14 Q Now I'd like to direct your attention to request
15 No. 6 of our document request. Now did you personally
16 conduct a search for documents that fall into category
17 request No. 6?

18 A Yes, I did.

19 Q And did you find any documents relating to the
20 organization of family other than the articles of
21 incorporation and the certificate from the Virgin Islands
22 that was sent to us?

23 A No, I didn't.

24 Q Did you find any documentation or any documents, I
25 should say, relating to the ownership of family?

1 A Just the documents that we have the initial
2 articles of incorporation.

3 Q In other words, your search did not uncover any
4 stock certificates?

5 A No, it did not.

6 Q Stock register or ledger?

7 A No, it did not.

8 Q By-laws?

9 A Not that I can recall.

10 Q Minutes of directors' meetings?

11 A No.

12 Q Corporate resolutions?

13 A No.

14 Q Proxies?

15 A No.

16 Q Now I want to return to Deposition Exhibit No. 1
17 in this case. It would be a section for question 12, which
18 appears on page 6. And that question reads as follows:
19 "Financial qualifications. Transferee certifies that
20 sufficient net liquid assets are on hand or are available
21 from committed sources to consummate the transaction and
22 operate the stations for three months." And the "yes" box
23 is marked.

24 I take it this was a question that you answered?

25 A Yes.

1 Q Could you explain the basis for your "yes" answer?

2 A Well, although my parents will no longer have
3 anything to do, as far as the station, as far as the
4 operation, that will come solely under my control. My
5 mother has already informed me that she would assist
6 financially with the station, she would provide, whether it
7 is a loan, to the station in order for the operation to
8 continue.

9 Q Now would this be from assets that are in the name
10 of Family Broadcasting, Inc. or from some other assets?

11 A Solely from Asta K. James, my mother.

12 Q And are you knowledgeable of whatever it is that
13 she is going to be able to draw on to be able to support the
14 family in whatever way necessary?

15 A Yes, I am.

16 Q And what is that?

17 A She has a savings account that she is willing to
18 loan to continue the operation until the station is able to
19 come within compliance and then we'll make arrangements for
20 repayment to her.

21 Q So this is a savings account in her name?

22 A Yes, it is.

23 Q And it's not one that your father has anything to
24 do with?

25 A No, it isn't.

1 Q Have you seen a statement or some documentation
2 relative to whatever that account has in it?

3 A Yes.

4 Q I'd like you to return to Deposition Exhibit 2,
5 and this time page 4, question 11-E. The documentation
6 concerning the account, is that something that you looked
7 at, the account that we just talked about, the one for your
8 mother? Was it your understanding that such information was
9 or was not encompassed by our request 11-E?

10 A I was unaware that you needed that documentation.
11 If you need it, I can provide it.

12 MR. SHOOK: We would request it, yes.

13 MR. COLBY: So you need the savings account, the
14 mother's saving account?

15 MR. SHOOK: Whatever it is that Barbara relied on,
16 whatever it is that she relied on. If there are certain
17 things from a privacy standpoint that you wish to block out,
18 that's acceptable.

19 MR. COLBY: We can probably have that here today.

20 BY MR. SHOOK:

21 Q All right. Now returning to Deposition Exhibit 1,
22 page 2, section 2, question 4, the percentages of ownership
23 that are noted there for your father and your mother, that
24 happens to leave 7 percent unaccounted for, if my math is
25 correct. Would you agree?

1 A Yes, it does.

2 Q Now do you know who it is that owns that other
3 7 percent.

4 A No, I don't, not specifically.

5 Q Generally?

6 A Oh, sorry. Yes.

7 Q I realize that wasn't much of a question. Who
8 might that be?

9 A If I am correct, they may be friends of -- my
10 father's friends and family members.

11 Q So there could be multiple individuals who own the
12 other 7 percent?

13 A To the best of my knowledge.

14 Q And is there any information written anywhere to
15 identify who these people are and what their ownership
16 interest might be?

17 A Not that I am aware of.

18 Q Did you ever ask your father whether such existed?

19 A I did, and he said he would get the information
20 but I haven't got back any information yet.

21 Q How long ago did you ask him?

22 A When we were working on these documents.

23 Q Say a month ago?

24 A About a month, approximately about a month.

25 Q And he hasn't gotten back to yet on that?

1 A Well, he is in the -- no, he hasn't.

2 Q If there was something that you wanted to add by
3 way of explanation, you may do so.

4 A Okay. Well, he is in the process of going through
5 files in his office to provide documentation that we needed
6 to complete these. And as soon as he gets those, then they
7 will be forwarded.

8 Q So you had sent him a copy of the document
9 request?

10 A I was there with him when I came back to him.

11 Q And that happened about a month ago?

12 A Approximately.

13 MR. SHOOK: I'm going to have the next one marked.

14 (The document referred to was
15 marked for identification as
16 Deposition Exhibit No. 3)

17 MR. SHOOK: Now once you have had a chance to take
18 a look at, if you could give me an idea of what you believe
19 the document to be.

20 (Witness examined document)

21 THE WITNESS: This is a copy of the ownership
22 report that was for both WSTX AM and WSTX FM that were
23 completed by my father.

24 BY MR. SHOOK:

25 Q And were filed with the FCC on December 4, 1995?

1 A '95. Yes, it is.

2 Q Now I'd like to direct your attention to page 3 of
3 that document, and you can check it, but I believe the
4 information that appears on page 7 is identical to that
5 which appears on page 3.

6 A Yes, it is.

7 Q Now you'll note on both pages 3 and 7 -- and to
8 make it easier, we're going to just look at three. You
9 don't have to look at both the same time. If you look at
10 page 3, you will note that according to this document, your
11 father, as of December 4, 1995, owned 60 shares of Family.
12 Your mother owned 25, and you owned 15.

13 Now to the best of your knowledge, is the
14 information that I just gave you accurate? Not in the sense
15 of what is reported on the form. We can both agree that the
16 numbers are 60, 25, and 15. What I am getting at is
17 whether, to the best of your knowledge, those numbers were
18 accurate?

19 A No, I don't believe -- no, I don't.

20 Q And what is the basis of your understanding that
21 these numbers were not accurate?

22 A My father is the one who completed these
23 documents. I have no information as far as this was
24 concerned. So I have no idea whether they are accurate or
25 not.

1 Q Have you ever talked about this information with
2 your father, that is, the 1995 ownership reports?

3 A No, not this one.

4 Q So as of December 4, 1995, would it be your
5 testimony that you did not own 15 shares of Family
6 Broadcasting?

7 A Not unless it was given to me. But I have no
8 direct knowledge.

9 Q Now if you look at the next line in that table,
10 No. 5, it represents number of votes. And according to
11 Deposition Exhibit No. 3, your father, your mother, and you
12 all held one vote as of December 4, 1995. Do you know
13 whether that is accurate or inaccurate?

14 A I have no knowledge.

15 Q Moving on to No. 6 -- well, No. 6 is nothing more
16 than stating that apparently there were three votes total,
17 that each of you had one, representing one-third of the
18 votes. Again, do you have any knowledge as to whether or
19 not that is accurate?

20 A No personal knowledge.

21 Q And is this is something that you have or have not
22 spoken with your father about?

23 A No. I have not spoken to him about this.

24 MR. COLBY: The reporter advises me that he is not
25 able to hear you.

1 THE WITNESS: Oh, I'm sorry.

2 MR. SHOOK: It's just that you happen to be so
3 soft-spoken that --

4 THE WITNESS: Oh, I'm sorry.

5 MR. COLBY: And also, you're speaking in the wrong
6 direction to the microphone. You should continue to --

7 MR. SHOOK: Well, I'll tell you what. Maybe if we
8 angle that a little differently, it will work out better.

9 THE WITNESS: I have a habit of facing the person
10 I'm speaking to.

11 MR. SHOOK: You're extremely polite, and that's
12 the way to do it. But I guess you have to do two things at
13 once.

14 Prior to today, have you ever seen Deposition
15 Exhibit 3 before?

16 THE WITNESS: I do believe I saw a copy of this,
17 this year.

18 BY MR. SHOOK:

19 Q Would that have been in connection with our
20 admissions request that we sent to you in March?

21 A Yes.

22 Q And you had not seen it prior to that time?

23 A Not that I can recall, ever.

24 Q Did your father ever inform you that you were a
25 shareholder of Family?

1 A Well, as far as this amount, no.

2 Q How about any amount?

3 A Well, to the best of my knowledge, it was owned
4 solely by family members. But my father was the one who
5 took charge of everything. So since it was a family
6 business, we just took it for granted it's all within the
7 family. But as far as numbers, specific numbers, I have no
8 personal knowledge of how many shares each person had.

9 Q And directing your attention back to Deposition
10 Exhibit No. 1, page 2, question 4, would it be correct that
11 you filled out these percentages before you became aware of
12 the information that appears on page 3 of Deposition
13 Exhibit 3?

14 A Yes.

15 Q I know I have asked this question or a similar
16 kind of question to it before, but are you aware of any
17 stock records of any kind to show -- or which indicates
18 changes of ownership between September of 1990 and December
19 of 1995?

20 A No, I have not been able to come across any.

21 Q And the reason I picked those dates is because
22 September of 1990 is when Family took over the operations of
23 the stations, and December of 1995 is the date that appears
24 on Deposition Exhibit 3. And you have not been able to
25 locate any records of any kind reflecting changes of

1 ownership of Family stock?

2 A No, I have not.

3 Q Now I'd like to direct your attention to our
4 Deposition Exhibit 2, page 3, request No. 7. Now if memory
5 serves, one of the documents that your counsel forwarded to
6 us were some ownership forms, which I believe were a part of
7 the 1995 renewal application for the stations. Are you
8 aware of any other ownership records, besides what we have
9 here in Deposition Exhibit 3, and then what you have
10 referred to in terms of what existed in September of 1990.

11 MR. COLBY: We stipulate Deposition Exhibit 3 is
12 the ownership report.

13 MR. SHOOK: Correct.

14 MR. COLBY: 1995 ownership report.

15 THE WITNESS: No, no other reports.

16 MR. SHOOK: Now directing your attention to
17 Deposition Exhibit 2, our request No. 8, if you could just
18 briefly read that to yourself.

19 (Witness examined document)

20 BY MR. SHOOK:

21 Q In response to Deposition Exhibit 2, request No.
22 8, you did submit to us articles of incorporation, correct?

23 A Yes.

24 Q And you also submitted to us a certificate which
25 reflected that Family's articles had been filed with the

1 government in the Virgin Islands in 1990.

2 A Yes.

3 MR. SHOOK: I'd like this one marked, please.

4 (The document referred to was
5 marked for identification as
6 Deposition Exhibit No. 4)

7 BY MR. SHOOK:

8 Q Now with respect to Deposition Exhibit No. 4, I'd
9 like to direct your attention to page 2. And under article
10 5, there appear three names, two of which I believe are your
11 father and your mother.

12 A Yes.

13 Q Now there is a third name, and undoubtedly I'm
14 going to butcher the pronunciation here, so help with that.

15 A Leonile A. Sealey.

16 Q Leonile? Okay. I wouldn't have done that. But
17 anyway, could you tell me who Leonile A. Sealey is?

18 A She is a cousin.

19 Q A cousin?

20 A Yes, she is.

21 MR. COLBY: Could you speak a little?

22 THE WITNESS: I'm sorry. She is a cousin.

23 BY MR. SHOOK:

24 Q Is she a cousin of your father's or a cousin of
25 you or --

- 1 A My father.
- 2 Q Your father?
- 3 A Yes.
- 4 Q Did she ever own any stock in Family?
- 5 A I have no knowledge of that.
- 6 Q Is she currently alive?
- 7 A Yes, she is.
- 8 Q And does she still reside where it is noted here?
- 9 A Yes, she does.
- 10 Q Now I take it from the numbers that the houses are
11 very close to each other?
- 12 A Yes, they are.
- 13 Q Has Leonile A. Sealey ever had anything to do with
14 the operation of the stations?
- 15 A No, she hasn't, that I'm aware of.
- 16 Q And you don't know one way or the other whether
17 she has any ownership interest in Family?
- 18 A None that I am aware of.
- 19 Q So far as you know, she does not own any stock in
20 Family Broadcasting?
- 21 A That's correct.
- 22 Q She wouldn't be part of that 7 percent that we are
23 trying to figure out who owns?
- 24 A Not that I'm aware of.
- 25 Q Now to the best of your understanding, is Family

1 Broadcasting, Inc., currently in good standing in the Virgin
2 Islands?

3 A As far as I know, yes.

4 Q Are there annual reports or taxes of some kind
5 that must be filed in order to maintain Family's standing in
6 the Virgin Islands?

7 A Yes.

8 Q Has Family filed all such required reports?

9 A I have no knowledge of that. My father was the
10 one who did everything, all the paperwork, everything
11 concerning Family Broadcasting.

12 Q Do you know whether copies of any such reports or
13 filings exist?

14 A I was able to find some, but I'm still in the
15 process of trying to locate others, going through files to
16 see what else there is.

17 Q Now the sum that you found, what was that, other
18 than that certificate that you sent us for the filing in
19 1990?

20 A You asked about the taxes, and there were two
21 years that I was able to find. That's all.

22 Q Just so we understand each other, I think what you
23 have just referred to are the federal tax returns that were
24 filed. What I'm asking about right now are any reports or
25 tax forms that were filed with the Virgin Islands in order

1 to maintain the corporation's standing in the Virgin Islands
2 as a viable corporate entity.

3 A Oh, I have no knowledge.

4 Q Have you ever looked for any materials like that?

5 A Well, I have been looking for all documents
6 relative to the discovery they requested, and I have not
7 come across anything like that.

8 Q But so far as you know, all required reports have
9 in fact been submitted to the government in the Virgin
10 Islands on whatever manual basis or whatever the basis that
11 they require.

12 MR. COLBY: A slight objection here. I think she
13 answered she didn't -- I think she already answered that she
14 did not.

15 MR. SHOOK: I wasn't really sure whether she
16 answered that she knew that such filings had actually taken
17 place or not. You don't know?

18 THE WITNESS: No, I don't. I have no knowledge of
19 that.

20 BY MR. SHOOK:

21 Q Could you ascertain that for us, whether or not
22 the corporation is currently in good standing in the Virgin
23 Islands?

24 A I would have to get that information.

25 MR. COLBY: I may be able to get that online and